

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

JANE DOE,	)	CASE NO.: 5:18-CV-01870
	)	
Plaintiff,	)	JUDGE: SARA LIOI
	)	
vs.	)	<b><u>JOINT STATUS REPORT TO COURT</u></b>
	)	
DAVID ALLEN FOSTER, et al.,	)	
	)	
Defendants.	)	

Now come Defendants, City of Norton, City of Norton Police Department, Chief of Police John Dalessandro, Officer Ryan Seeker, Officer John Karnuth, Officer Brett McShane, Officer Christopher Besse, Officer Joshua Pond, Solicitor Justin Markey, Assistant Prosecutor Michelle Banbury, and Assistant Prosecutor Jennifer Roberts (the “Norton Defendants”) and City of Barberton, City of Barberton Law Department, Lisa O. Miller, and Diana Stevenson (the “Barberton Defendants”), by and through their respective counsel, and submit the following Status Report concerning the progress of the underlying criminal case.

On December 3, 2018, Attorney Russell Buzzelli filed a Motion to Withdraw as counsel for Plaintiff in her criminal proceedings. A copy of that Motion is attached. On December 7, 2018, the Barberton Municipal Court held a Hearing in the criminal case. The Court granted Mr. Buzzelli’s Motion to Withdraw. A further Hearing has been set for January 4, 2019 at 10:00 a.m. Defendants are unaware of the status of Mr. Buzzelli’s representation in the within matter given the representations made in the criminal proceedings. At this time, Mr. Buzzelli has not sought to withdraw as counsel in the civil case. Additionally, the Motion to Withdraw Plea and Petition for

Probable Cause are still pending before the Municipal Court. At the most recent Hearing, the Court suggested that Plaintiff file a Motion to Seal her criminal record; however, to date, no such Motion has been filed.

Respectfully submitted,

*s/ Christina M. Nicholas*

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*s/Tami Z. Hannon*

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Seeker, Officer John Karnuth, Officer Brett  
McShane, Officer Christopher Besse, Officer  
Joshua Pond, Solicitor Justin Markey,  
Assistant Prosecutor Michelle Banbury and  
Assistant Prosecutor Jennifer Roberts*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 14, 2018, a copy of the foregoing Status Report to Court was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

*s/Tami Z. Hannon*

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Karnuth, Officer Brett McShane, Officer  
Christopher Besse, Officer Joshua Pond, Solicitor  
Justin Markey, Assistant Prosecutor Michelle L.  
Banbury, and Assistant Prosecutor Jennifer Roberts*

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